

This motion is brought in good faith, including to avoid unnecessarily burdening the Court, and to streamline the issues in trial so as to avoid confusing the jury. Movants respectfully submit that severance avoids potential delay of WSOU's claims, averts undue complication of judicial proceedings, avoids prejudice and confusion, and otherwise comports with considerations of sound judicial management. Further, a stay permits a clarifying of the scope of relief sought by Canon's claims against NXP, at least in part.

For the reasons stated herein, Third-Party Plaintiff Canon and Third-Party Defendant NXP respectfully request that the Court sever Third-Party Plaintiff Canon's claims in its third-party complaint against NXP and stay such claims until 30 days after WSOU's distinct claims against Canon have been dismissed or are ripe for any post-trial appeal, whichever is earlier.

June 13, 2022

Respectfully submitted,

By: /s/ Richard F. Martinelli

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 13, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

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